

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., et al.,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD., WEST REALM SHIRES
SERVICES, INC., and ALAMEDA RESEARCH
LTD.,

Adv. Pro. No. 23-50759 (JTD)

Plaintiffs,

-against-

MIRANA CORP., BYBIT FINTECH LTD., TIME
RESEARCH LTD., SIN WEI "SEAN" TAN, WEI
LIN "GERMAINE" TAN, WEIZHENG YE, and
NASHON LOO SHUN LIANG,

Defendants.

DECLARATION OF WEISHENG CHEN

I, Weisheng Chen, hereby declare and state pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of defendant Mirana Corp.'s ("Mirana") motion to dismiss the complaint. The statements in this declaration are based upon my personal knowledge and my review of records kept in the ordinary course of business by Mirana and of the complaint filed in the above-captioned adversary proceeding.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. A list of Debtors and the last four digits of their tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

2. I am the Group Financial Controller for Mirana and have held that position since May 17, 2022. I am employed by a Mirana subsidiary incorporated in Singapore. I reside in Singapore and have my business address at Mirana's principal office in Singapore.

3. Mirana is incorporated in the Republic of Seychelles where it maintains a registered office. Mirana's principal office and principal place of business is in Singapore.

4. Mirana does not maintain an office in the United States. Mirana does not own or lease any real estate in the United States. Mirana is not registered to do business in any state in the United States. Mirana does not file federal or state income tax returns in the United States.

5. All members of Mirana's board of directors and all of Mirana's senior officers reside and work in Singapore, except for Mirana's General Counsel who resides and works in Hong Kong.

6. Certain Mirana officers and staff are employees or independent contractors of Mirana subsidiaries. No direct or indirect subsidiary of Mirana is incorporated or maintains an office in the United States.

7. A total of 37 individuals have been employees or independent contractors of Mirana or its subsidiaries during the period (in whole or in part) from September 1, 2021, to the present. 32 out of those 37 individuals resided and worked in Singapore or elsewhere outside the United States throughout their tenures with Mirana or its subsidiaries.

8. Four former independent contractors of Mirana resided in the United States and worked remotely. Each of them was a member of Mirana's Ventures Team that manages Mirana's venture capital investments, which focus on Web3 technologies. At present, only a single independent contractor of Mirana resides in the United States. That independent contractor works remotely as a researcher on Mirana's Ventures Team.

9. Mirana and its subsidiaries currently maintain all of their bank accounts in Singapore and Hong Kong, and use those accounts to fund operations and pay employees. Mirana also opened a bank account at Signature Bank in the United States in 2021 (the “Signature Account”). The Signature Account was closed in or about March 2023. Mirana has not maintained any bank account in the United States at any time since the closure of that account.

10. In September 2021, Mirana opened an account on the FTX.com cryptocurrency exchange with an account number ending in 8451 (“Mirana’s FTX.com Account”). During the 90-day period prior to November 11, 2022, Mirana’s FTX.com Account was managed by Mirana’s Asset Management Team, and defendant Sean Tan was Mirana’s Asset Management Director and the head of that team. Throughout that same period, Mr. Tan and the other members of Mirana’s Asset Management Team resided and worked in Singapore or (in the case of one independent contractor) elsewhere outside the United States.

11. Mirana received an email from the “FTX VIP Team” (vip@ftx.com) bearing the subject line “VIP/MM Program Invitation” and dated August 6, 2022. A true and correct copy of that email is attached hereto at Exhibit 7.

12. In paragraphs 79 and 88 and Exhibits A-1-25 and C-1-33, the complaint alleges in part that Mirana received from FTX Trading Ltd. (“FTX”) a transfer of \$500,000 “USD” on November 8, 2022, pursuant to a withdrawal from Mirana’s FTX.com Account. Mirana did not receive any such transfer.

13. I reviewed a copy of the withdrawal history for Mirana’s FTX.com Account downloaded by Mirana personnel from the “FTX Customer Claims Portal” (located at <https://claims.ftx.com>) as an Excel file on or about December 3, 2023 (the “Withdrawal History”). The Withdrawal History identifies the “status” of a \$500,000 withdrawal from Mirana’s FTX.com

Account on November 8, 2022, as “processing” and not (like certain other withdrawals identified therein) as “complete.” A true and correct copy of an excerpt from the Withdrawal History is attached hereto as Exhibit 8, with the \$500,000 “processing” entry highlighted in yellow.


14. In addition, I reviewed copies of the account statements for the month ending November 30, 2022, for each bank account then maintained by Mirana or its subsidiaries, including Mirana’s since-closed Signature Account. None of those account statements reflects the receipt of a \$500,000 transfer from FTX on or about November 8, 2022, or otherwise.

15. I understand that Bybit Fintech Ltd. (“Bybit”) and Time Research Ltd. (“Time Research”) are also named as defendants in this adversary proceeding. Bybit and Time Research are separate legal entities from Mirana. Neither Bybit nor Time Research is a parent or subsidiary of Mirana, either directly or indirectly.

16. Mirana has not submitted a proof of claim in the above-captioned chapter 11 cases.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 5TH day of February, 2024



Weisheng Chen